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*Attorneys for Defendants State of Nevada ex rel the*  
8 *Nevada Department of Corrections, Waylon Brown,*  
9 *Sean French, Kerry Hunter, Jacob Corey, and Derrick*  
*Williams*

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12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 MARTY FURTADO, an individual; MARTY  
FURTADO, SPECIAL ADMINISTRATOR  
15 OF ESTATE OF ANDREW THURGOOD,

16 Plaintiffs,

17 v.

18 STATE OF NEVADA, ex rel, NEVADA  
DEPARTMENT OF CORRECTIONS; ADAM  
19 MICHAEL ISAACSON, an individual;  
ANTHONY M. WILLIAMS, an individual;  
20 OFFICER RUBEN R. JIMENEZ, acting in  
his individual capacity; OFFICER RICK L.  
21 BROWN, acting in his individual capacity;  
DOES 1-20,  
22

23 Defendants.

Case No. 2:18-cv-00188-APG-BNW

**STIPULATION TO STAY CASE FOR  
SETTLEMENT NEGOTIATIONS**

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25 Plaintiff Marty Furtado, by and through counsel, Travis N. Barrick, Esq., and  
26 Defendants State of Nevada ex rel. the Nevada Department of Corrections, Waylon Brown,  
27 Sean French, Kerry Hunter, Jacob Corey, and Derrick Williams (“the NDOC Defendants”)  
28 by and through counsel, Aaron D. Ford, Nevada Attorney General, and Jared M. Frost,

1 Senior Deputy Attorney General, hereby agree and stipulate to stay the case for sixty (60)  
2 days for settlement negotiations.

3 “The District Court has broad discretion to stay proceedings as an incident to its  
4 power to control its own docket.” *Clinton v. Jones*, 520 U.S. 681, 706 (1997) (citation  
5 omitted).

6 The parties submit there is good cause to stay this matter. On March 26, 2019, the  
7 parties filed a Stipulation and Protective Order Governing Sensitive and Confidential  
8 Material that was subsequently approved by the Court. ECF No. 60; *see also* ECF No. 61.  
9 The protective order facilitated the NDOC Defendants’ disclosure of case-related  
10 information and materials on March 8, 2019, and April 5, 2019.

11 After reviewing of the disclosures, counsel for Plaintiff and counsel for the NDOC  
12 Defendants met on June 7, 2019, to discuss the status of the case. Counsel for Plaintiff  
13 indicated that Plaintiff intends to seek leave to file a Third Amended Complaint that would  
14 add new parties and claims. Counsel for Plaintiff also communicated a settlement offer to  
15 the NDOC Defendants to resolve this case in its entirety.

16 At this juncture all parties desire time to explore the possibility of settlement to  
17 determine whether this matter can be resolved without the need for additional litigation.  
18 However, the discovery period is currently set to expire on June 27, 2019, and dispositive  
19 motions are due July 29, 2019. ECF No. 51 at 4. Therefore, the parties request a sixty (60)  
20 day stay of the case to conclude their settlement negotiations and determine whether this  
21 matter can be resolved. At the end of the sixty (60) day stay, the Court should direct the

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1 parties to file either a notice of settlement or a joint status report setting forth their  
2 positions as to how the case should move forward.

3 DATED this 25th day of June, 2019.

DATED this 25th day of June, 2019.

4 GALLIAN WELKER & BECKSTROM, LTD.

AARON D. FORD  
Attorney General

5 By: /s/ Travis N. Barrick  
6 TRAVIS N. BARRICK, ESQ.  
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*Attorneys for Plaintiff*

By: /s/ Jared M. Frost  
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*Attorneys for the NDOC Defendants*

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10 **ORDER**

11 **SO ORDERED.** This matter is stayed for sixty (60) days from the date of this Order.  
12 At the end of the sixty (60) day period, the parties shall file a notice of settlement or a joint  
13 status report setting forth the parties' positions as to how this case should move forward.

14 Dated this 26th day of June, 2019.

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17 UNITED STATES MAGISTRATE JUDGE